

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JPMORGAN CHASE BANK, N.A.,)	
)	
Plaintiff,)	
)	
v.)	
)	
CHARLIE JAVICE, OLIVIER AMAR,)	
CHARLIE JAVICE, in her capacity as Trustee)	
of CHARLIE JAVICE 2021 IRREVOCABLE)	C.A. No. 22-01621-MN
TRUST #1, CHARLIE JAVICE, in her)	
capacity as Trustee of CHARLIE JAVICE)	PUBLIC VERSION
2021 IRREVOCABLE TRUST #2, and)	
CHARLIE JAVICE in her capacity as Trustee)	
of CHARLIE JAVICE 2021 IRREVOCABLE)	
TRUST #3,)	
)	
Defendants.)	

**PLAINTIFF'S MOTION TO PARTIALLY LIFT THE PRIVATE SECURITIES
LITIGATION REFORM ACT DISCOVERY STAY**

JPMorgan Chase Bank, N.A. (“Plaintiff”) hereby moves to lift the general discovery stay under the Private Securities Litigation Reform Act of 1995 to conduct limited, particularized discovery targeting Defendant Charlie Javice’s transfer of proceeds from the merger at issue in this litigation and failure to preserve evidence. The bases for this Motion are set forth in Plaintiff’s Opening Brief and upon the papers, records, and pleadings on file with the Court.

Pursuant to LR 7.1.1, counsel for the parties conferred by telephone, but were unable to reach agreement on this motion.

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Dated: April 7, 2023
Public version dated: April 10, 2023
10734091

By: /s/ Jonathan A. Choa

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